

ENTERED

June 12, 2020

David J. Bradley, Clerk

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

Roman Vazquez Barrera, <i>et al.</i> ,	§	
	§	
Petitioners/Plaintiffs,	§	
	§	
v.	§	Civil Action No. 4:20-cv-1241
	§	
Chad Wolf, <i>et al.</i> ,	§	
	§	
Respondents/Defendants.	§	

STIPULATED PROTECTIVE ORDER

Pursuant to the Court's June 8, 2020 order (Dkt. 94), Plaintiffs and Defendants hereby stipulate to and petition the Court to enter this Stipulated Protective Order ("Order") regarding the accompanying spreadsheet ("Spreadsheet"), filed separately under seal as document number 96.

1. The Spreadsheet, and the information contained therein, is for the exclusive use of Plaintiffs' counsel, defined as the attorneys of record for the Plaintiffs and associated personnel necessary to assist counsel in this action, such as law student interns working under the supervision of counsel of record in this matter, litigation assistants, paralegals, and litigation support, information technology, information or records management, investigative, secretarial, or clerical personnel, in order to prosecute this litigation only.

2. The Spreadsheet and the information contained in it may be disclosed to experts or consultants for the parties, provided that the expert or consultant agrees that such information to be disclosed is confidential and to be used solely for the purpose of this litigation and further that these restrictions are imposed by a court order.

3. The Spreadsheet is the work product of Defendants. This Order does not apply to the United States, its employees, its attorneys, or persons hired or in the employ of its attorneys.

4. Except as provided herein, no person having access to the Spreadsheet, or any portion of the Spreadsheet, shall make any disclosure of same without further order of the Court.

5. Plaintiffs' counsel may not share the Spreadsheet, or any portion of the Spreadsheet, with other persons except as provided within this Order. They may not otherwise show or transmit the data in the Spreadsheet, or any portion of the Spreadsheet, in any form to their clients, the media, or any other individual.

6. The Spreadsheet, including any portion of the Spreadsheet, shall not be used in any briefing, hearing, trial, or appellate proceeding in this action unless provision shall be made for exclusion of the public or unless some other reasonable provision to protect confidentiality has been made. When the Spreadsheet, including any portion of the Spreadsheet, is used in a briefing, hearing, trial, or appellate proceeding in this action, the appropriate portion of the brief or court transcript shall be redacted and/or placed under seal. Such designation shall be limited to those portions of the brief or transcript the redaction or sealing of which is reasonably necessary to preserve the confidentiality of the Spreadsheet, and any portion of the Spreadsheet, as well as copies or summaries made thereof and any information derived therefrom, which are subject to the terms of this Order.

7. Each party reserves the right to move to modify the terms of this Order at any time, and each party reserves the right to oppose any motion to modify this Order.

8. Within 90 days of the final conclusion of this litigation, including any appeals, Plaintiffs' counsel shall return the Spreadsheet, and any portion of the Spreadsheet, to Defendants' counsel pursuant to the terms of this Order, or shall shred any copies and provide Defendants'

counsel verification of destruction within 90 days of the final conclusion of this litigation, including any appeals. In the same timeframe and with the same verification to Defendants' counsel, Plaintiffs' counsel also shall permanently delete the Spreadsheet, and any portion of the Spreadsheet, from each and every location in which it is stored electronically, including, but not limited to, email accounts and computer servers.

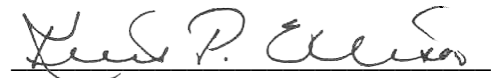
9. This Order does not constitute any ruling on the question whether any additional documents or information are properly discoverable, and does not constitute any ruling on any potential objection to the discoverability, relevance, or admissibility of any additional document or information. Nor does this Order constitute any ruling on the question whether Defendants may withhold any additional document or information on the basis of privilege.

10. This Order shall be binding upon Plaintiffs and Defendants, including in any appeal of any decision(s) of this Court with respect to this litigation.

11. This Order shall be effective and enforceable upon its signature by counsel and by the Court.

SO ORDERED.

Date: June 11, 2020.



Hon. Keith P. Ellison
United States District Judge

AGREED TO BY:

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Chief, Civil Division

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